

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

PlayUp, Inc., a Delaware Corporation,

Case No. 2:21-cv-02129-GMN-NJK

Plaintiff,

v.

Dr. Laila Mintas, an individual,

Defendant.

**JOINT STIPULATION AND ORDER  
TO EXTEND LIMITED FACT WITNESS  
DISCOVERY PURSUANT TO LOCAL  
RULE IA 6-1 AND LOCAL RULE 26-3  
(Third Request)**

Dr. Laila Mintas, an individual,

Counter-Claimant,

v.

PlayUp, Inc., a Delaware Corporation; PlayUp  
Ltd., an Australian company; Daniel Simic, an  
Individual,

Counter-Defendants.

Following the Court's hearing on the Emergency Motion for Protective Order (Dkt. No. 189) on August 2, 2022, and pursuant to Local Rules IA 6-1 and 26-3, Plaintiff/Counter-Defendant PlayUp Inc. ("PlayUp US") and Defendant/Counter-Claimant Laila Mintas ("Mintas"), enter into the following stipulation regarding an enlargement of time for limited fact witness depositions. This is the third request for an extension of discovery, and it is entered into in good faith and without an intent to delay.

**I. STIPULATION**

1. Counsel hereby stipulate to extend the period in which they can take limited fact witness depositions as set forth below from August 22, 2022, through September 22, 2022 (the "Extended Deposition Period"), with the understanding that no depositions will be scheduled between August 15, 2022 and September 5, 2022<sup>1</sup>.

<sup>1</sup> PlayUp US also intends to and reserves its right to depose Matteo Monteverde and will notice his deposition to occur within the current discovery period. Mintas similarly reserves all

2. The depositions of Chris Cheung and Jamie Blankenship currently scheduled for August 4, 2022, and August 10, 2022, respectively, shall occur as scheduled.

3. The deposition of Jeremy Kleiman, Esq., currently noticed for August 19, 2022, will be rescheduled for September 21.

4. The deposition of PlayUp US' 30(b)(6) corporate representative previously noticed will be rescheduled for September 13 and 14, 2022.

5. The continued deposition of Feridun Mintas will be scheduled for September 20, 2022.

## **II. DISCOVERY STATUS**

### **A. Discovery that Has Been Completed**

1. The parties have exchanged mandatory initial disclosures and supplements thereto.
2. PlayUp US has served upon Mintas a First Set of Interrogatories on March 23, 2022, Second Set of Interrogatories on June 6, 2022, First Set of Requests for Production of Documents on February 22, 2022, and Second Set of Requests for Production of Documents on March 24, 2022.
3. Mintas responded to the First Set of Requests for Production of Documents on March 24, 2022. Mintas Responded to the First Set of Interrogatories on April 22, 2022, and to the Second Set of Requests for Production of Documents on April 25, 2022. Mintas served Amended Responses to the First Set of Interrogatories on June 15, 2022. Mintas served Supplemental Responses to the First and Second Set of Requests for Production of Documents on June 16, 2022. Mintas served Responses to Second Set of Interrogatories on July 6, 2022.
4. Mintas has served upon PlayUp US a First Set of Requests for Production of Documents, Second Set of Requests for Production of Documents, First Set of Interrogatories and Second Set of Interrogatories.
5. PlayUp US responded to the First Set of Requests for Production of Documents on

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rights.

1 March 3, 2022. PlayUp US Responded to the Second Set of Requests for Production  
2 of Documents and Responses to First Set of Interrogatories on April 28, 2022.  
3 PlayUp US' Responses to the Second Set of Interrogatories are due on August 5,  
4 2022.

5 6. Mintas has served upon Mr. Simic both requests for production of documents and  
6 interrogatories and served on PlayUp Ltd. requests for production of documents.  
7 Simic and PlayUp Ltd. have objected to this written discovery while their motions  
8 to dismiss for lack of personal jurisdiction are pending.

9 7. PlayUp US has conducted the deposition of Mintas' husband, Feridun, on June 22,  
10 2022. The parties stipulated to complete the deposition at a later date virtually and  
11 limited to 90 minutes per the stipulation on the record at the deposition.

12 8. PlayUp US conducted the deposition of Laila Mintas on June 23 and June 24, 2022  
13 for a total of 10 hours. PlayUp has filed a Motion seeking a second deposition and  
14 that motion is pending. Dkt. No. 180.

15 9. Mintas served a Subpoena Duces Tecum on Dennis Drazin on March 29, 2022. A  
16 Motion to Quash was filed both in Nevada and New Jersey. Mintas' counsel has  
17 notified PlayUp US that she has withdrawn the Subpoena and the Court will be  
18 notified.

19 10. PlayUp US served a Subpoena Duces Tecum on Feridun Mintas on March 28, 2022.  
20 Feridun Mintas responded to that Subpoena Duces Tecum on April 6, 2022, and  
21 had no responsive documents.

22 11. PlayUp US served a Subpoena Duces Tecum on Adrianna Cuccinello Samuels on  
23 March 31, 2022 and Ms. Samuels produced documents on April 6, 2022.

24 12. PlayUp US served a Subpoena Duces Tecum on the Nevada Gaming Commission  
25 on March 24, 2022 and the Commission responded on March 30, 2022.

26 13. PlayUp US served a Subpoena Duces Tecum on the Nevada Gaming Control Board  
27 on March 24, 2022 and the Board responded on March 30, 2022.

28 14. PlayUp US served a Subpoena Duces Tecum on Sportradar on March 31, 2022 and,

1 following the Magistrate's Order (Dkt. No. 139) Sportradar produced documents  
2 on June 10, 2022.

3 15. PlayUp US served a Subpoena Duces Tecum on Bally's Corporation on May 24,  
4 2022. Bally's responded on June 15, 2022 and the documents were served on  
5 Mintas by PlayUp US on approximately June 23, 2022.

6 16. Mintas served a Subpoena on Jamie Blankenship for her deposition on July 29,  
7 2022 in the morning. Thereafter PlayUp US served a Subpoena Duces Tecum for  
8 Jamie Blankenship for her deposition on July 29, 2022, as well, and for a document  
9 production by July 28, 2022. To date, Mintas has not been served with any  
10 subpoena response of Ms. Blankenship by PlayUp US.

11 17. Mintas served a Subpoena on Chris Cheung for his deposition on July 29, 2022 in  
12 the afternoon. Thereafter, PlayUp US served a Subpoena Duces Tecum for Chris  
13 Cheung for his deposition on August 1, 2022, and for a document production by  
14 July 28, 2022. Mintas was served with Mr. Cheung's document production by  
15 PlayUp US on August 2, 2022.

16 **B. Discovery that Remains**

- 17 1. Deposition of PlayUp Inc., Corporate Representative
- 18 2. Deposition of Jamie Blankenship
- 19 3. Deposition of Chris Cheung
- 20 4. Deposition of Jeremy Kleiman, Esq.
- 21 5. Continued deposition of Feridun Mintas

22 **C. Reason for the Requested Extension**

23 After a telephonic hearing, the parties as directed by the Magistrate Judge agree to the  
24 Extended Deposition Period to provide time to complete the remaining depositions on mutually  
25 agreeable dates, including the deposition of PlayUp US' 30(b)(6) corporate representative. Lead  
26 trial counsel for PlayUp US has represented he is unavailable due to a pre-scheduled overseas trip  
27 from August 3, 2022, until August 12, 2022, and is responsible for defending the 30(b)(6)  
28 corporate representative deposition. Counsel for Mintas has represented that she begins a three-

1 week trial on August 15, 2022, in Nevada State Court and therefore cannot reschedule the  
 2 deposition for PlayUp US during the week of August 15, 2022 through close of discovery of  
 3 August 22, 2022. In light of the scheduling conflicts, the Extended Deposition Period is necessary  
 4 in order to complete these remaining depositions.

5 **D. Proposed Schedule**

- 6 1. The deadline to complete the depositions of PlayUp US' 30(b)(6) corporate  
 7 representative, Jeremy Kleiman, and Feridun Mintas shall be extended from  
 8 **August 22, 2022, to September 22, 2022**, with the understanding that no  
 9 depositions will be scheduled between August 15, 2022 and September 5, 2022.
- 10 2. The current dispositive motions deadline of **September 27, 2022**, shall be extended  
 11 to **October 31, 2022**.
- 12 3. The current deadline for a pretrial order of **October 28, 2022**, shall be extended to  
 13 **November 30, 2022**.

14 **IT IS SO STIPULATED**

15 Dated this 3rd day of August 2022.

16 NAYLOR & BRASTER

17 /s/ Jennifer L. Braster

18 Jennifer L. Braster Esq.  
 19 Nevada Bar No. 9982  
 Benjamin B. Gordon, Esq.  
 20 Nevada Bar No. 15552  
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 21 Las Vegas, NV 89145

22 *Attorneys for Defendant/Counter-*  
 23 *Claimant Dr. Laila Mintas*

24 **IT IS SO ORDERED.**

25 Dated: August 4, 2022

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 Nancy J. Koppe  
 United States Magistrate Judge

Dated this 3rd day of August 2022.

ZUMPARO PATRICIOS POPOK & HELSTEN

/s/ Amanda J. Brookhyser

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